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*Attorneys for Defendant Allison Marie Baver*

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

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**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**ALLISON MARIE BAVER**

Defendant.

**Notice of Explanation and Certification to  
the Court**

Case No. 2:21-cr-00520

District Judge Jill N. Parrish

Magistrate Judge Cecilia Romero

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Ms. Baver's Rule 33 motion deadline is today. Counsel certifies that the motion was finalized on July 14, 2025<sup>1</sup>. Due to a fundamental disagreement, counsel filed a motion to withdraw today. Filing the Rule 33 motion now could lead to ineffective assistance claims and prevent Ms. Baver, or new counsel, from amending it. Counsel faces a dilemma: not filing violates the Court's order, while filing could disadvantage Ms. Baver. Counsel believes he must

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<sup>1</sup> Counsel has saved a PDF copy should the Court require a copy.

withhold filing until the withdrawal motion is resolved. This is the only way counsel can uphold his duty to Ms. Bayer.

RESPECTFULLY SUBMITTED this July 22, 2025.

Alexander E. Ramos  
LANGFORD RAMOS, PLLC  
/s/ Alexander E. Ramos

/s/ Nicolas C. Wilde  
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